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in his official capacity as Attorney General
10 *of the State of California*

11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION
14

15 **STEVEN RUPP; STEVEN**
16 **DEMBER; CHERYL JOHNSON;**
17 **MICHAEL JONES;**
18 **CHRISTOPHER SEIFERT;**
19 **ALFONSO VALENCIA; TROY**
20 **WILLIS; and CALIFORNIA RIFLE**
21 **& PISTOL ASSOCIATION,**
22 **INCORPORATED,**

23 Plaintiffs,

24 v.

25 **ROB BONTA, in his official capacity**
26 **as Attorney General of the State of**
27 **California; and DOES 1-10,**

28 Defendants.

Case No. 8:17-cv-00746-JLS-JDE

DECLARATION OF JOHN D.
ECHEVERRIA IN SUPPORT OF
DEFENDANT'S OPPOSITION TO
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT

[Dkt. 150]

Date: July 28, 2023
Time: 10:30 a.m.
Courtroom: 8A
Judge: Hon. Josephine L. Staton
Trial Date: None set
Action Filed: April 24, 2017

1 I, John D. Echeverria, hereby declare and state the following:

2 1. I am a Deputy Attorney General at the California Department of Justice
3 and serve as counsel to Defendant Rob Bonta, in his official capacity as Attorney
4 General of the State of California (“Defendant”), in the above-titled matter. I make
5 this declaration in support of Defendant’s Opposition to Plaintiffs’ Motion for
6 Summary Judgement. Unless otherwise stated, I have personal knowledge of the
7 facts set forth herein and am competent to testify thereto.

8 2. In support of Defendant’s Motion for Summary Judgment, Dkt. 149,
9 Defendant relied on Defendant’s Exhibits 1 through 46, filed previously in support
10 of and in opposition to the prior motions for summary judgment, *see* Dkts. 76, 90.

11 3. In support of Defendant’s Motion for Summary Judgment, Defendant
12 also submitted Defendant’s Exhibits 47 through 87. *See* Dkt. 151.

13 3. Attached hereto are true and accurate copies of the following additional
14 exhibits, which Defendant relies on in support of the concurrently filed Defendant’s
15 Opposition to Plaintiff’s Motion for Summary Judgment:

Exhibit Number	Document Description	Page Number
88	Deposition of Mark T. Hanish, <i>Oregon Firearms Fed’n v. Brown</i> , D. Or. No. 2:22-cv- 01815-IM (Jan. 13, 2023) (excerpts)	3030- 3057
89	Email from Sean Brady to John D. Echeverria, dated March 3, 2023	3058- 3061
90	Am. Ass’n for Public Opinion Research, <i>The Code of Professional Ethics and Practices</i> (2020)	3062- 3070
91	Deposition of Gary D. Kleck, <i>Oregon Firearms Fed’n v. Brown</i> , D. Or. No. 2:22-cv- 01815-IM (Jan. 25, 2023) (excerpts)	3071- 3080
92	Nat’l Shooting Sports Found., <i>Modern Sporting Rifle Comprehensive Consumer Report</i> (2022)	3081- 3162
93	U.S. Dep’t of Justice, Bureau of Alcohol, Tobacco, Firearms & Explosives, <i>Firearms Commerce in the United States: Annual Statistical Update 2021</i> (2021)	3163- 3191

Exhibit Number	Document Description	Page Number
94	Ltr. From Stephanie M. Boucher, Chief, Disclosure Division, ATF, to Jeffrey E. Folloder, Feb. 24, 2016	3192-3193
95	Darrell A.H. Miller & Jennifer Tucker, <i>Common, Use, Lineage, and Lethality</i> , 55 U.C. Davis L. Rev. 2495 (2022)	3194-3213
96	Deposition of Ashley Hlebinsky, <i>Oregon Firearms Fed'n v. Brown</i> , D. Or. No. 2:22-cv-01815-IM (Jan. 20, 2023) (excerpts)	3214-3234
97	Deposition of Clayton Cramer, <i>Oregon Firearms Fed'n v. Brown</i> , D. Or. No. 2:22-cv-01815-IM (Jan. 19, 2023) (excerpts)	3235-3254
98	Second Declaration of Clayton Cramer, <i>Oregon Firearms Fed'n v. Brown</i> , D. Or. No. 2:22-cv-01815-IM (Dec. 19, 2022)	3255-3307
99	Declaration of Yvette Glover, <i>Miller v. Bonta</i> , No. 19-cv-1537 BEN-JLB (S.D. Cal. Dec. 15, 2020)	3308-3311

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 23, 2023, at San Francisco, California.

/s/ John D. Echeverria
John D. Echeverria
Deputy Attorney General